

REMARKS

Claims 1, 5-7, 10-11, and 13-19 are pending herein.

I. The anticipation rejections based on Huang (US 2004/0098379).

The USPTO respectfully rejects claims 1, 5-7, 10-11 and 13-19 under 35 U.S.C. § 102(e) as being anticipated by Huang. Claims 1, 7, and 19 are independent claims.

A. Huang does not disclose searching the plurality of directory structures based on the first name and the second name, as claimed in claims 1, 7, and 19.

Claim 1 claims in relevant part:

“wherein the plurality of directory structures constitutes a hierarchical structure and the prescribed directory structure includes at least two directories of a directory having a first name and a directory having a second name, the directory searching method comprising:

...;

searching the plurality of directory structures **based on the first name and the second name** so as to extract all the prescribed directory structure comprising the directory having the first name and the directory having the second name in the storage medium.” (emphasis added)

Claims 7 and 19 claim similar limitations. Regarding these limitations, it is respectfully not seen where Huang discloses the claimed method quoted above.

Specifically, the USPTO respectfully alleges on page 3 of the Office Action that paragraph 28 and Figures 8-9 of Huang disclose the specifically claimed searching the plurality of directory structures based on the first name and the second name of claims 1, 7, and 19. However, it is respectfully asserted that **Huang does not disclose any searching of a directory structure based on a first name of a directory and second name of a directory, as claimed in claim 1. It is respectfully important to note that the “first name” and the “second name” claimed in claim 1 are names of directories, as defined in lines 3-5 of claim 1, lines 3-4 of claim 7, and lines 3-5 of claim 19.**

Regarding the Huang reference, it is respectfully noted that Figures 8 and 9 and

paragraph 28 of Huang disclose searching based on a person's name (i.e. "Jack" or "Jill" in Figure 8 of Huang or "John III" in Figure 9 of Huang). However, **these names of people in Huang are not first and second names of directories**, as claimed in claims 1, 7, and 19.

Instead, **the names shown in Figures 8 and 9 of Huang are merely traits associated with a particular media file**. For example, as noted in paragraph 19 of Huang, the "people related to the media file is stored in the database along with the path of the file." Thus, it is respectfully seen that **the names in Figures 8 and 9 of Huang and the directory names are two different pieces of information**. Thus, because the names of people shown in Figures 8 and 9 of Huang are not names of directories, it is respectfully asserted that searching based on names of people in Huang is not the same as searching directory structures based on a first directory name and a second directory name, as claimed in claims 1, 7, and 19.

Additionally, it is respectfully important to note that Huang does not disclose a search based on the actual names of directories. As the USPTO alleges on pages 2-3 of the Office Action, Huang allegedly discloses a hierarchical directory structure in paragraphs 16 and 17. However, **Huang does not disclose searching based on the names of directories in this hierarchical directory structure**.

For example, as seen in Figures 8 and 9 and paragraph 28 of Huang, a user can allegedly search based on "people, category, keywords, filename, and title." **It is respectfully important to note that "directory name" is not included in this list of searchable attributes in Huang**. As noted above, it is respectfully important to note that the "first name" and "second name" of present claims 1, 7, and 19 are names of directories, as defined in claims 1, 7, and 19. Thus, because Huang does not disclose that a search can be based on a directory name, it is respectfully asserted that Huang cannot disclose searching the plurality of directory structures based on the first name and the second name, as claimed in claims 1, 7, and 19.

In contrast, present Figure 7 illustrates one possible embodiment of the claimed method quoted above. Specifically, present Figure 7 shows a step S101 where **a first directory name and a second directory name can be entered** (see page 16, lines 13-16 of the present specification). In the particular example described on page 16 of the present specification, the entered directory names are "ImageDir" and "IMGD1."

In steps S102 and S103, all items on a hard disk (i.e., the directory structure) are **searched based on the entered first directory name and second directory name** (see page 16, line 22 through page 17, line 2 of the present specification). Thus, steps S102 and S103 illustrate one possible embodiment of searching the plurality of directory structures based on the first name and the second name, claimed in claims 1, 7, and 19.

B. The dependent claims.

As noted above, it is respectfully asserted that independent claims 1 and 7 are allowable, and therefore it is further respectfully asserted that dependent claims 5-6, 10-11 and 13-18 are also allowable.

II. Conclusion.

Reconsideration and allowance of all of the claims is respectfully requested.

If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 06-1130.

Please contact the undersigned for any reason. Applicants seek to cooperate with the Examiner including via telephone if convenient for the Examiner.

Respectfully submitted,

By
/Daniel P. Lent/
Daniel P. Lent
Registration No. 44,867

Date: September 18, 2007
CANTOR COLBURN LLP
55 Griffin Road South
Bloomfield, CT 06002
Telephone (860) 286-2929
Facsimile (860) 286-0115
Customer No.: 23413